

EAA supports the FAA/TSA direct rule, FAA-2002-11666, as published, but has the following concerns:

1. The plan does not address authorized Student Pilot or Pilot ID requirements for teenagers who, per state laws, are not able to obtain state issued photo "driver's licenses".
2. The plan does not address state laws, e.g. NJ, that don't require driver's to have a state issued photo drivers license and the associated costs required by states to modify their laws and office equipment to support this direct rule.
3. EAA supports the comments submitted by The Soaring Society of America, Inc., No. FAA-2002-11666-21.
4. EAA supports the comments submitted by Intelli-Check, Inc., No. FAA-2002-11666-28. This petitioner is correct in that there are well over 5,000 web sites, plus many other non-web sources, that offer to provide "false identification", a fact well known in the state of California and their problem with false drivers license's, e.g. FAA-2001-11133-2428. And the fact that modern state-of-the-art, off-the-shelf equipments exists to provide verification of individual ID's.
5. The threats facing the U.S. today are not just aimed at access to aviation. Aviation was the tool used on 9/11, but other modes of transportation were used in past acts against the U.S. EAA feels TSA and DOT need to make this direct rule applicable to those other modes of transportation - over-the-road trucks, buses, marine vessels, truck rental operations, rail, etc. Only by creating a single individual photo ID requirement that covers all modes of travel will this rule be a truly effective one. Expanding this direct rule to cover all modes of travel will also answer the issues addressed by the state of New York, e.g. FAA-2002-11666-27.

Again, EAA supports the direct rule as an interim solution to the national and local concerns created by the 9/11 attack. But to be an effective rule that provides the necessary level of security to all Americans, it must be applied to all modes of transportation - not just aviation.

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